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Anthony M. Alessi
Director
Federal Relations

May 18, 1994

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MAY 18 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, DC 20554

RE: Ex Parte Statement
Docket No. 93-162
Expanded Interconnection

Dear Mr. Caton:

On May 13, 1994, Mr. Jay Blomquist, Manager - IIS & Network Regulatory and Mr. Mike Silver, Manager - Cost Operations (Special Access) of Ameritech and I spoke with Ms. Carol Canteen of the Tariff Division concerning recent Ameritech data submissions in the above referenced docket.

Ameritech explained that there were two fundamental differences in the average per-DS1 prices developed in the Teleport Model Office-based priceout submitted April 6, 1994 and the TRP function-based priceout submitted April 26, 1994. First, the two models are based on different demand quantities. The Teleport Model uses demand quantities provided by Teleport in its original model, whereas the TRP model uses averages based on the demand forecast displayed in Exhibit 6 of Ameritech's original special access interconnection tariff, filed February 16, 1993. Teleport's cabling footage quantities are substantially higher than average, resulting in a substantially higher cost per DS1. The TRP model also overstates per-DS1 costs, by including demand for elements not included in the Teleport model. For example, the TRP model includes .21875 units of a rate element called "Ability to connect One (additional) 7' Equipment Bay to Central Office DC Power." The Teleport Model Office does not include this element.

The second fundamental difference is that one model uses rates and the other model uses price surrogates. The Teleport Model Office update used current rates (which include appropriate RAFs), whereas the TRP priceout update used the most recent updated costs, with no RAFs applied, as surrogates for prices.

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The disparity introduced by this difference can be demonstrated using the Central Office Floorspace rate element. The rate used in the Teleport model is the current rate of \$381.77 per 100 square feet. This rate was developed by applying a RAFed overhead factor of 1.48 to the underlying unit cost of \$257.95. The price surrogate used in the TRP model is \$407.56. This surrogate is derived by applying the non-RAFed overhead factor of 1.58 to the \$257.95 unit cost.

In addition, Ameritech is submitting, at the request of staff, a revised version of the TRP function priceout originally submitted on April 26, 1994 to reflect a basis of 100 DS1s instead of the single-DS1 basis originally used.

Sincerely,


Attachment

cc: G. Vogt
C. Canteen
C. Needy

\master2.wk3
 April 14, 1994
 FCC Data Request
 *Goto B363 for Guidelines,
 *Goto B336 for priceout chart

AMERITECH SE TRP FUNCTION RATES
AND PRICEOUT ANALYSIS

| Row No. | LEC NAME | Rate | UOM | Units | Recurring Charges | NRCs |
|---------|---------------------------------------|--------|-------------|-------|-------------------|------------|
| 1 | FUNCTIONS | | | | | |
| 2 | | | | | | |
| 3 | | | | | | |
| 4 | Entrance Facility Installation-rec | | | | | |
| 5 | conduit fixed/low | | | | | |
| 6 | conduit fixed/high | | | | \$0.00 | |
| 7 | conduit | | | | \$0.00 | |
| 8 | TOTAL | | | | \$0.00 | |
| 9 | | | | | | |
| 10 | Entrance Facility Installation-nrc | | | | | |
| 11 | inspector (normal business hours) | | | | | |
| 12 | pector (out of normal business hours) | | | | | |
| 13 | fiber cable splicing | | | | | |
| 14 | design eng | | | | | |
| 15 | fiber placement conduit | | | | | |
| 16 | fiber placement riser | | | | | |
| 17 | core drill | | | | | |
| 18 | low central office | | | | | |
| 19 | high central office | | | | | |
| 20 | Vault splicing-Initial | | | 1 | | \$193.19 |
| 21 | Vault splicing-Subseq. | | | 23 | | \$346.38 |
| 22 | Splice testing-Initial | | | 1 | | \$44.21 |
| 23 | Splice testing-Subseq. | | | 23 | | \$60.03 |
| 24 | Cable pull-M to V initial | | | 1 | | \$209.08 |
| 25 | Cable pull-M to V add'l | | | 274 | | \$284.96 |
| 26 | tac - small | | | | | |
| 27 | tac - medium | | | | | |
| 28 | tac - large | | | | | |
| 29 | cable pull & splice -first 1/2 | | | | | |
| 30 | cable pull & splice -add'l 1/2 | | | | | |
| 31 | cable pull | | | | | |
| 32 | TOTAL | | | | | \$1,137.85 |
| 33 | | | | | | |
| 34 | Entrance Facility Space-rec | | | | | |
| 35 | conduit/innerduct | \$0.06 | INNERDUCT F | 239 | \$14.34 | |
| 36 | riser | \$0.02 | PER FT. | 100 | \$2.00 | |
| 37 | riser group ll | | | | | |
| 38 | riser group lll | | | | | |
| 39 | low central office | | | | | |
| 40 | high central office | | | | | |
| 41 | cable vault space | | | | | |
| 42 | space/linear ft | | | | | |
| 43 | conduit space | | | | \$0.00 | |
| 44 | conduit space -fixed/low | | | | | |
| 45 | conduit space-fixed/high | | | | | |
| 46 | interconnection floor space | | | | | |
| 47 | TOTAL | | | | \$16.34 | |
| 48 | | | | | | |
| 49 | Entrance Facility Space-nrc | | | | | |
| 50 | entrance enclosure manhole | | | | | |
| 51 | entrance enclosure handhole | | | | | |
| 52 | conduit/innerduct | | | | | |
| 53 | riser | | | | | |
| 54 | Cable pull-V to N initial | | | 1 | | \$78.08 |
| 55 | Cable pull-V to N add'l | | | 264 | | \$203.28 |
| 56 | TOTAL | | | | | \$281.36 |
| 57 | | | | | | |
| 58 | Common Construction-rec | | | | | |

| | | | |
|-----|---------------------------------------|---|-------------|
| 59 | low central office | | |
| 60 | high central office | | |
| 61 | TOTAL | | \$0.00 |
| 62 | | | |
| 63 | Common Construction-nrc | | \$0.00 |
| 64 | cage enclosure w/out redundant HVAC | | |
| 65 | ard wall enclosure w/o redundant HVAC | | |
| 66 | cage enclosure with redundant HVAC | | |
| 67 | low central office | | |
| 68 | CENTRAL OFFICE BUILDOUT | 1 | \$12,728.83 |
| 69 | tac - small | | |
| 70 | tac - medium | | |
| 71 | tac - large | | |
| 72 | TOTAL | | \$12,728.83 |
| 73 | | | |
| 74 | Construction Provision'g-rec | | |
| 75 | TOTAL | | \$0.00 |
| 76 | | | |
| 77 | Construction Provision'g-nrc | | \$0.00 |
| 78 | humidification | | |
| 79 | quotation preparation fee | | |
| 80 | cage enclosure with redundant HVAC | | |
| 81 | cage enclosure w/out redundant HVAC | | |
| 82 | ard wall enclosure w/o redundant HVAC | | |
| 83 | central office floor space | | |
| 84 | space construction charge | | |
| 85 | application fee-ORDER CHARGE | 1 | \$531.16 |
| 86 | space prep fee | | |
| 87 | TOTAL | | \$531.16 |
| 88 | | | |
| 89 | Interconnector-Specific-rec | | |
| 90 | chamber renonv02 | | |
| 91 | chamber renonv13 | | |
| 92 | chamber crcynv01 | | |
| 93 | chamber sprknv11 | | |
| 94 | central office-new ironwork | | |
| 95 | central office-some existing ironwork | | |
| 96 | TOTAL | | \$0.00 |
| 97 | | | |
| 98 | Interconnector-Specific-nrc | | |
| 99 | cage enclosure with redundant HVAC | | |
| 100 | cage enclosure w/o redundant HVAC | | |
| 101 | ard wall enclosure w/o redundant HVAC | | |
| 102 | humidification | | |
| 103 | central office-new ironwork | | |
| 104 | central office-some existing ironwork | | |
| 105 | wire gage | | |
| 106 | house electric | | |
| 107 | space consruction charge | 1 | \$336.06 |
| 108 | Central office buildout | 1 | \$5,748.00 |
| 109 | transmission node enclosure | | \$6,084.06 |
| 110 | TOTAL | | |
| 111 | | | |
| 112 | Floor Space-rec | | \$0.00 |
| 113 | humidification | | |
| 114 | maintenance | | |
| 115 | base rent area 1 | | |
| 116 | base rent area 2 | | |
| 117 | base rent area 3 | | |
| 118 | Washigton-48 volt (low) | | |
| 119 | Arizona-48 volt (high) | | |
| 120 | interconnection chamber renonv02 | | |
| 121 | interconnection chamber renonv13 | | |
| 122 | interconnection chamber crcynv01 | | |
| 123 | interconnection chamber sprknv11 | | |
| 124 | partitioned space-floor 1 | | |

| | | | | | |
|-----|---------------------------------------|----------|---------------------|-----|----------|
| 125 | partitioned space-floor 11 | | | | |
| 126 | partitioned space-floor 111 | | | | |
| 127 | low central office | | | | |
| 128 | high central office | | | | |
| 129 | net band | | | | |
| 130 | nyt band 1 | | | | |
| 131 | nyt band 2 | | | | |
| 132 | nyt band 3 | | | | |
| 133 | nyt band 4 | | | | |
| 134 | interconnection floor space | \$407.56 | PER 100 SQ. | 1 | \$407.56 |
| 135 | TOTAL | | | | \$407.56 |
| 136 | | | | | |
| 137 | Floor Space-nrc | | | | |
| 138 | TOTAL | | | | \$0.00 |
| 139 | | | | | |
| 140 | Termination Equipment-rec | | | | |
| 141 | ds1 EICT | | | | |
| 142 | ds3 EICT | | | | |
| 143 | cage enclosure redundant HVAC | | | | |
| 144 | interconnection chamber renonv02 | | | | |
| 145 | interconnection chamber renonv13 | | | | |
| 146 | interconnection chamber crcynv01 | | | | |
| 147 | interconnection chamber sprknv11 | | | | |
| 148 | ds-1 cross connection | | | | |
| 149 | ds-3 cross connection | | | | |
| 150 | floor space | | | | \$0.00 |
| 151 | ds-1 oct | | | | |
| 152 | ds-3 oct | | | | |
| 153 | ds-1 term panel | \$0.76 | PER DS1 TER | 100 | \$76.00 |
| 154 | ds-3 term panel | \$9.65 | PER DS3 TERMINATION | | \$0.00 |
| 155 | pot frame | | | | |
| 156 | ds-1 interconnection arrangement | | | | |
| 157 | ds-3 interconnection arrangement | | | | |
| 158 | TOTAL | | | | \$76.00 |
| 159 | | | | | |
| 160 | Termination Equipment-nrc | | | | |
| 161 | cage construction | | | | |
| 162 | ds-1 interconnection arrangement | | | | |
| 163 | ds-1 interconnection arrg partitioned | | | | |
| 164 | ds-3 interconnection arrg partitioned | | | | |
| 165 | TOTAL | | | | \$0.00 |
| 166 | | | | | |
| 167 | DC Power Installation-rec | | | | |
| 168 | power - preferred DC | | | | |
| 169 | low central office | | | | |
| 170 | high central office | | | | |
| 171 | pot power 40 amp | | | | |
| 172 | pot power 100 amp | | | | |
| 173 | partitioned space-floor 1 | | | | |
| 174 | partitioned space-floor 11 | | | | |
| 175 | partitioned space-floor 111 | | | | |
| 176 | TOTAL | | | | \$0.00 |
| 177 | | | | | |
| 178 | DC Power Installation-nrc | | | | |
| 179 | cable installation 48 volt | | | | |
| 180 | cage construction/cable install | | | | |
| 181 | cable installation 48 volt | | | | |
| 182 | power cabling 0-30ft | | | | |
| 183 | power cabling 31-60ft | | | | |
| 184 | power cabling 61-100ft | | | | |
| 185 | power cabling 101-140ft | | | | |
| 186 | power cabling 141+ft | | | | |
| 187 | power per 40 amp increment | | | | |
| 188 | low central office | | | | |
| 189 | high central office | | | | |
| 190 | pot power 40 amp | | | | |

| | | | | | | |
|-----|--------------------------------------|--------|-------------|-------|--|-------------|
| 191 | pot 100 amp | | | | | |
| 192 | central office buildout | | | 1 | | \$21,822.34 |
| 193 | ability-connect 7 ft bay | | | 0 | | \$0.00 |
| 194 | TOTAL | | | | | \$21,822.34 |
| 195 | | | | | | |
| 196 | DC Power Generation-rec | | | | | \$0.00 |
| 197 | AMERITECH 48 VOLT DC POWER | \$7.99 | PER FUSE AM | 20 | | \$159.80 |
| 198 | Arizona-48 volt (high) | | | | | |
| 199 | power - preferred DC | | | | | |
| 200 | low central office | | | | | |
| 201 | high central office | | | | | |
| 202 | pot power 40 amp | | | | | |
| 203 | pot power 100 amp | | | | | |
| 204 | interconnection floor space | | | | | |
| 205 | DC USG 1 | | | | | |
| 206 | DC USG 11 | | | | | |
| 207 | DC USG 111 | | | | | |
| 208 | TOTAL | | | | | \$159.80 |
| 209 | | | | | | |
| 210 | DC Power Generation-nrc | | | | | |
| 211 | TOTAL | | | | | \$0.00 |
| 212 | | | | | | |
| 213 | DS1 Cross-Conn. Provision'g-rec | | | | | |
| 214 | TOTAL | | | | | \$0.00 |
| 215 | | | | | | |
| 216 | DS1 Cross-Conn. Provision'g-nrc | | | | | |
| 217 | ds-1 ECIT | | | | | |
| 218 | TOTAL | | | | | \$0.00 |
| 219 | | | | | | |
| 220 | DS3 Cross-Conn. Provision'g-rec | | | | | |
| 221 | TOTAL | | | | | \$0.00 |
| 222 | | | | | | |
| 223 | DS3 Cross-Conn. Provision'g-nrc | | | | | |
| 224 | ds-3 ECIT | | | | | |
| 225 | TOTAL | | | | | \$0.00 |
| 226 | | | | | | |
| 227 | DS1 Cross-Conn. Cable/Cable Supp-rec | | | | | |
| 228 | ds-1 EICT | | | | | |
| 229 | EIS channel termination ds1 | | | | | |
| 230 | Oct - cable portion | | | | | |
| 231 | connection service-coax cable | | | | | |
| 232 | connection service-cable rack | | | | | |
| 233 | floor space | | | | | \$0.00 |
| 234 | riser space | \$1.77 | PER FT | 100 | | \$177.00 |
| 235 | ds-1 electric cross-conn | \$6.89 | PER DS1 | 100 | | \$689.00 |
| 236 | ds-1 CABLING PER 1ST FT | \$0.69 | PER FT | 100 | | \$69.00 |
| 237 | ds-1 CABLING PER ADDITIONAL FT | \$0.01 | PER FT | 15000 | | \$150.00 |
| 238 | transmission arrangement | | | | | |
| 239 | TOTAL | | | | | \$1,085.00 |
| 240 | | | | | | |
| 241 | DS1 Cross-Conn. Cable/Cable Supp-nrc | | | | | |
| 242 | interconnection arrangement | | | | | |
| 243 | transmission arrangement | | | | | |
| 244 | TOTAL | | | | | \$0.00 |
| 245 | | | | | | |
| 246 | DS3 Cross-Conn. Cable/Cable Supp-rec | | | | | |
| 247 | ds-3 ECIT | | | | | |
| 248 | EIS channel termination ds3 | | | | | |
| 249 | Oct - cable portion | | | | | |
| 250 | connection service-coax cable | | | | | |
| 251 | connection service-cable rack | | | | | |
| 252 | floor space | | | | | \$0.00 |
| 253 | riser space | \$0.09 | PER FT | 0 | | \$0.00 |
| 254 | ds-3 electric cross-conn | | | | | \$0.00 |
| 255 | ds-3 CABLING PER 1ST FT | \$9.52 | PER FT | 0 | | \$0.00 |
| 256 | ds-3 CABLING PER ADDITIONAL FT | \$0.05 | PER FT | 0 | | \$0.00 |

| | | | | | |
|-----|--------------------------------------|---------|-------------|--------|-------------|
| 257 | transmission arrangement | | | | |
| 258 | TOTAL | | | \$0.00 | |
| 259 | | | | | |
| 260 | DS3 Cross-Conn. Cable/Cable Supp-nrc | | | | |
| 261 | interconnection arrangement | | | | |
| 262 | transmission arrangement | | | | |
| 263 | TOTAL | | | | \$0.00 |
| 264 | | | | | |
| 265 | DS1 Cross-Conn. Equipment-rec | | | | |
| 266 | ds-1 ECIT | | | | |
| 267 | connection service-repeaters | \$7.88 | PER REPEATE | 0 | \$0.00 |
| 268 | floor space | | | | \$0.00 |
| 269 | ds-1 cross connect | | | | \$0.00 |
| 270 | ds-1 termination | | | | \$0.00 |
| 271 | TOTAL | | | | \$0.00 |
| 272 | | | | | |
| 273 | DS1 Cross-Conn. Equipment-nrc | | | | |
| 274 | TOTAL | | | | \$0.00 |
| 275 | | | | | |
| 276 | DS3 Cross-Conn. Equipment-rec | | | | |
| 277 | ds-3 ECIT | | | | |
| 278 | floor space | | | | \$0.00 |
| 279 | ds-3 cross connect | | | | |
| 280 | connection service-repeaters | \$45.72 | PER REPEATE | 0 | \$0.00 |
| 281 | ds-3 termination panel | | | | |
| 282 | TOTAL | | | | \$0.00 |
| 283 | | | | | |
| 284 | DS3 Cross-Conn. Equipment-nrc | | | | |
| 285 | TOTAL | | | | \$0.00 |
| 286 | | | | | |
| 287 | Security Installation-rec | | | | |
| 288 | low central office | | | | |
| 289 | high central office | | | | |
| 290 | TOTAL | | | | \$0.00 |
| 291 | | | | | |
| 292 | Security Installation-nrc | | | | \$0.00 |
| 293 | partitioned space-group 1 | | | | |
| 294 | partitioned space-group 11 | | | | |
| 295 | partitioned space-group 111 | | | | |
| 296 | bldg & constr-group 1 | | | | |
| 297 | bldg & constr-group 11 | | | | |
| 298 | bldg & constr-group 111 | | | | |
| 299 | low central office | | | | |
| 300 | high central office | | | | |
| 301 | tac - small | | | | |
| 302 | tac - medium | | | | |
| 303 | CENTRAL OFFICE BUILDOUT | | | 1 | \$10,643.51 |
| 304 | TOTAL | | | | \$10,643.51 |
| 305 | | | | | |
| 306 | Security Active-rec | | | | |
| 307 | TOTAL | | | | \$0.00 |
| 308 | | | | | |
| 309 | Security Active-nrc | | | | \$0.00 |
| 310 | access card-new | | | | |
| 311 | access card-replacement | | | | |
| 312 | security service normal hours | | | | |
| 313 | security service out of normal hours | | | | |
| 314 | security escort first 1/2 hour | | | | |
| 315 | security escort add'l 1/2 hour | | | | |
| 316 | CENTRAL OFFICE BUILDOUT | | | 1 | \$1,338.85 |
| 317 | | | | | |
| 318 | | | | | |
| 319 | | | | | |
| 320 | | | | | |
| 321 | | | | | |
| 322 | | | | | \$1,338.85 |

| | | | | | | | |
|-----|---|--------|-------------|-------------|------------|------------|-------------|
| 323 | | | | | | | |
| 324 | TOTAL | | | | | \$1,744.70 | \$54,567.96 |
| 325 | AMORTIZED TOTAL per MONTH | | | | | | \$1,193.25 |
| 326 | PRICEOUT PER DS1 | | | | | \$29.38 | |
| 327 | | | | | | | |
| 328 | PRICE-OUT of LATEST REVISIONS UNDER INVESTIGATION | | | | | | |
| 329 | NRCs | Unit | te under in | Rate*Unit | P function | Trp | cross-ck |
| 330 | Cage | 1 | \$5,747.93 | \$5,747.93 | | | \$0.00 |
| 331 | Order Charge | 1 | \$531.16 | \$531.16 | | | \$0.00 |
| 332 | CO Build-Out | 1 | \$46,900.23 | \$46,900.23 | | | \$0.00 |
| 333 | Cable Splice - INITIAL SPLICE | 1 | \$193.19 | \$193.19 | | | \$0.00 |
| 334 | Cable Splice - SUBSEQUENT SPLICE | 23 | \$15.06 | \$346.38 | | | \$0.00 |
| 335 | Cable Pull - MANHOLE TO VAULT 1ST FT | 1 | \$209.08 | \$209.08 | | | \$0.00 |
| 336 | Cable Pull - M.H.TO VAULT ADDITIONAL | 274 | \$1.04 | \$284.96 | | | \$0.00 |
| 337 | CABLE PULL - VAULT TO NODE 1ST FT | 1 | \$78.08 | \$78.08 | | | \$0.00 |
| 338 | CABLE PULL - VAULT TO NODE ADDITIONAL | 264 | \$0.77 | \$203.28 | | | \$0.00 |
| 339 | SPLICE TEST- INITIAL SPLICE | 1 | \$44.21 | \$44.21 | | | \$0.00 |
| 340 | SPLICE TEST- SUBSEQUENT SPLICE | 23 | \$2.61 | \$60.03 | | | \$0.00 |
| | ABILITY TO CONNECT 1 7 FT. EQPT. BAY | 0 | \$16,549.13 | \$0.00 | | | |
| 341 | TOTAL NRC | | | \$54,598.53 | | | \$0.00 |
| 342 | AMORTIZED TOTAL NRC | | | \$1,193.92 | | | \$0.00 |
| 343 | | | | | | | |
| 344 | RECURRING CHARGES | | | \$0.00 | | | \$0.00 |
| 345 | CO Floor Space | 1 | \$407.56 | \$407.56 | | | \$0.00 |
| 346 | Riser Space | 100 | \$1.79 | \$179.00 | | | \$0.00 |
| 347 | Entrance Conduit | 239 | \$0.06 | \$14.34 | | | \$0.00 |
| 348 | DC Power | 20 | \$7.99 | \$159.80 | | | \$0.00 |
| 349 | DS1 Cross-connect | 100 | \$6.89 | \$689.00 | | | \$0.00 |
| 350 | TERMINATION PANEL PER DS1 | 100 | \$0.76 | \$76.00 | | | \$0.00 |
| | DS1 CABLING - FIRST FT. | 100 | \$0.69 | \$69.00 | | | \$0.00 |
| | DS1 CABLING - ADDITIONAL FT. | 15,000 | \$0.01 | \$150.00 | | | \$0.00 |
| | DS1 REPEATER | 0 | \$7.88 | \$0.00 | | | \$0.00 |
| 351 | TOTAL RECURRING | | | \$1,744.70 | | | \$0.00 |
| 352 | TOTAL CHARGES | | | \$2,938.62 | | | \$0.00 |
| 353 | TOTAL MONTHLY CHARGES PER DS1 | | | \$29.39 | | | \$0.00 |
| 354 | | | | | | | |

ASSUMPTIONS: 1) CENTRAL OFFICE BUILDOUT RATES INCLUDE CARRIER ACCESS BILLING COSTS
2) RISER RATES DO NOT INCLUDE THE PORTION ATTRIBUTABLE TO DS3 EQUIPMENT

355 ASSUMPTIONS for priceout: (Guidelines)

356 1. List each assumption utilized in the development of your priceout, above.
357 (Note that the rate elements listed in the above priceout chart are generic;
358 each LEC should use its own structure in developing the above priceout.)
359

360 TRP Cross-check: (Guidelines)

361 1. In populating the TRP function chart above, fill in the rate, unit of measurement,
362 and unit for each function or rate element including the function that most
363 closely matches your rate structure.
364

365 2. Multiply rate * unit to get the appropriate recurring or nonrecurring charges for
366 the DS1 related functions or elements only. This will result in the per DS1.
367 rate in Row 326.
368

369 3. Identify, combine and align the rates/charges for each function that corresponds to
370 the appropriate rate element in your priceout chart above. The "rate * unit" column
371 in your priceout should match the "trp cross-ck column. Any discrepancy should
372 be explained. (In the "TRP function" column of the priceout chart above, place the
373 row number corresponding to that function/element; widen the column, if necessary)
374

375 4. Numbers 1 and 2 above will facilitate your demonstration of our fourth
376 directive in our April data request. Thanks for your cooperation.
377
378
379
380
381